

GUIDELINES FOR JURY INSTRUCTIONS IN CIVIL CASES

Senior Judge David G. Campbell

The parties shall submit a **joint** list of proposed jury instructions. The list shall contain three sections: Ninth Circuit model instructions, stipulated non-model instructions, and non-model instructions to which the parties have not stipulated.

I. Section I shall contain Ninth Circuit Model Civil Jury Instructions Used by All Arizona Judges as found at www.azd.uscourts.gov under Judicial Officer Information. If a model instruction is requested by both parties, the instruction shall be preceded by “ST” (stipulated). If the instruction is requested by only one party, the instruction shall be preceded by either “PL” (Plaintiff) or “DF” (Defendant).¹ For example:

ST	§ 3.1	Duties of Jury to Find Facts and Follow Law
PL	§ 3.3	What is Not Evidence
DF	§ 3.7	Direct and Circumstantial Evidence

The parties shall include the **full text** of all model instructions in the joint pleading. The parties should modify the model instructions to fit the facts and legal issues in the case.

II. Section II shall contain any **non-model** instructions to which the parties have stipulated.

III. Section III shall contain any non-model instructions to which the parties have not stipulated (numbered consecutively), with citation to authority to support the requested instruction. Any objection to the requested instruction shall be stated **immediately following** the requested instruction. If the objecting party proposes an alternative instruction, such alternative instruction shall **immediately follow** the objection. For example:

Plaintiff’s proposed non-model instruction;
 Defendant’s objection to Plaintiff’s proposed instruction;
 Defendant’s proposed alternative instruction, if any; and
 Plaintiff’s objection to Defendant’s proposed alternative instruction.

Each proposed instruction shall begin on a new page

¹ If multiple defendants, identify which defendant is requesting the instruction.